

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KEITH JOHNSON, COLBY GOROG,  
JOSHUA FLINT, LOUIS ROBINSON, and  
MICHAEL LERRO, individually and on  
behalf of all others similarly situated,

Plaintiffs,

- versus -

ELON MUSK, TESLA, INC. and the  
DOGECOIN FOUNDATION, INC.

Defendants.

**Case No.: 1:22-cv-5037-AKH**

**PLAINTIFF CERTIFICATION  
MICHAEL LERRO**

I, Michael Lerro, do swear under penalty of perjury as follows:

- i) I am a Plaintiff in this matter. I reviewed and approved the second amended complaint before it was filed with the Court.
- (ii) I did not purchase the security that is the subject of the second amended complaint at the direction of Plaintiffs' counsel or in order to participate in any private action arising under this chapter;
- (iii) I understand the duties and responsibilities as a Plaintiff under the Private Securities Litigation Reform Act.
- (iv) I am willing to serve as a representative party on behalf of a class, including providing testimony at deposition and trial, if necessary.
- (v) My Dogecoin transactions are attached hereto as **Exhibits "a" and "b"** (due to file size).
- (vi) I will not accept any payment for serving as a representative party on behalf of a class beyond the Plaintiffs' pro rata share of any recovery, except as ordered or approved by the Court.
- (vii) I have not sought to serve or served as a representative party for a class in an action under the federal securities laws within the past three years.

I swear or affirm that the foregoing statements made by me are true. I am aware that if same are willfully false, I may be subject to punishment.

SIGNED: /s/ Michael Lerro

DATED: December 12, 2022

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 12<sup>th</sup> day of December 2022, a true and correct copy of the above and foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system giving notice to all parties in this action.

s/Evan Spencer  
Evan Spencer